

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Newport News Division**

**PATRICIA E. MULLINEX,  
Individually and as Executor of the  
Estate of Herbert H. Mullinex, Jr.**

**Plaintiff,**

**v.**

**Case No. 4:18-cv-00033-RAJ-DEM**

**JOHN CRANE, INC.,**

**Defendant.**

**PLAINTIFF'S MOTION FOR DEFAULT**

COMES NOW Plaintiff, Patricia E. Mullinex, by counsel, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure and moves this Court to enter a default against Defendant, John Crane, Inc., on the basis that the record in this case demonstrates that there has been a failure to plead or otherwise defend, as required by this Court's Order (*see* ECF 447) and Fed. R. Civ. P. 15(a)(3). Plaintiff respectfully requests that this Court grant her motion for the reasons set forth in *Plaintiff's Memorandum in Support of Motion for Default* and *Plaintiff's Affidavit in Support of Request for Entry of Default* and for such other relief as the Court deems just and proper.

Respectfully Submitted,

By: /s/ Hugh B. McCormick, III, Esq.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 7th day of September, 2022, a true and accurate copy of the foregoing was filed electronically with the United States District Court for the Eastern District of Virginia using the CM/ECF system, which automatically sends all necessary notifications of this filing to the following:

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